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Federal Communications Commission
Office of the Secretary

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Re: WT Docket No. 01-309

Dear Ms. Dortch:

On May 20, 2003, representatives of the Alliance for Telecommunications Industry Solutions (ATIS) accompanied representatives of the Cellular Telecommunications & Internet Association (CTIA) for a meeting at the FCC regarding the ongoing proceedings on hearing aid compatibility (HAC).¹ Specifically, ATIS attended that meeting to discuss the related industry activity relative to an ATIS Incubator Solutions Program. Since that meeting, several companies have met with FCC staff on the HAC issue and supported the notion of an ATIS Incubator to resolve certain technical issues.² The purpose of this communication is twofold; first, to provide the Commission with further information regarding the initial work accomplished by the industry in establishing the structure and plan for the HAC Incubator and second, to demonstrate the support of the relevant stakeholders to address the technical issues in an ATIS Incubator.

By way of background, the ATIS Incubator Solutions Program provides a venue for stakeholders to come together to address technical and operational issues in an effort to develop industry resolutions in a focused and fast-tracked manner. ATIS has established and sunset two successful incubators since the program's start in late 2000. For example, the ATIS TTY Technical Standards Implementation (TTSI) Incubator was created as a venue for addressing technical implementation issues regarding the deployment of TTY services over digital wireless technologies.

¹ See Letter from Diane Cornell, CTIA and Ed Hall, ATIS, to Marlene H. Dortch, Secretary, Federal Communications Commission, dated May 21, 2003.

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² See Letter from Ben C. Almond, Vice President, Federal Regulatory Affairs, Cingular Wireless, to Marlene H. Dortch, Secretary, Federal Communications Commission, dated May 16, 2003; Letter from Leo R. Fitzsimon, Director, Government and Industry Affairs, Nokia, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, dated June 23, 2003; Letter from Luisa J. Lancetti, Vice President, Regulatory Affairs Sprint PCS, to Marlene H. Dortch, Secretary, Federal Communications Commission, dated June 19, 2003.

The TTSI Incubator identified problems with existing industry standards, held testing events to determine deployment success and developed a test program for Public Service Answering Points (PSAPs) to confirm compliance with applicable industry standards. The TTSI began work in mid-2001 and completed its work in time for the June 30, 2002 FCC deadline by which digital wireless service providers must be capable of transmitting 911 calls using TTY devices.³

The HAC Incubator was initially proposed by several companies pursuant to the Commission's decision to reexamine the exemption from the hearing aid compatibility requirements for certain mobile and wireless services and, in anticipation of the technical solutions required in order for phones and hearing aids to be compatible should the exemption be revoked. A steering committee was formed to develop a mission and map the necessary work. The steering group includes participants from Nokia, Sony-Ericsson, Cingular, Verizon Wireless, Sprint PCS and TEM Consulting. To date, the steering committee has developed a mission statement, a scope statement and a work plan in terms of objectives, deliverables and proposed timelines. The mission and scope of the Incubator was agreed to as follows:

Mission: To investigate performance between hearing aids and Mobile Stations to determine methods of enhancing interoperability and usability for consumers with hearing aids.

Scope: The hearing aid and digital wireless industries have complexities and challenges in attempting to make their products compatible. Through an open and impartial consensus process, the Incubator will investigate and develop recommendations for measuring hearing aid immunity, magnetic coupling, and interference caused by Mobile Stations. The Incubator will begin by re-assessing ANSI C63.19 to determine if the standard, as it is today, accurately predicts the end user experience. The Incubator will also re-assess the technical parameters and test methods in C63.19. The Incubator will communicate its findings to the Federal Communications Commission (FCC) and provide ANSI with recommended changes to C63.19 as appropriate. It will also serve as an incubator for determining methods of hearing aid immunity, magnetic coupling and HA interference.

In context of the timeline, the proposed two-year workplan encompasses a full review of HAC issues starting with a detailed analysis of ANSI C63.19. A report to the Commission regarding the validity and usability of ANSI C63.19 is to be completed within 6-9 months from the start of the Incubator.


³ The other ATIS Incubator was formed to ensure that the assignment registry for SS7 Point Codes reflected actual control and use as well as ownership. Due to mergers and acquisitions in the industry, the actual owner of a SS7 Point Code was not always clear causing problems in the network. More information on the ATIS Incubator Solutions Program may be found at www.atis.org.

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The steering committee has also solicited input from the relevant stakeholders regarding participation in the work effort and has received positive indications and assurances of participation from hearing aid manufacturers, mobile handset manufacturers, wireless service providers, audiologists, hearing health professionals and accessory manufacturers. The current chair of the ANSI C63.19 committee is expected to participate in the Incubator work effort as well providing a direct liaison back to C63.19.

Should you have any questions regarding the ATIS Incubator Solutions Program or, specifically, the proposed HAC Incubator, please contact me at 202-434-8847.

Sincerely,



Megan L. Campbell
General Counsel

cc: Chairman Michael K. Powell, FCC
Commissioner Kathleen Q. Abernathy, FCC
Commissioner Michael J. Copps, FCC
Commissioner Kevin J. Martin, FCC
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